

To: The Federal Communications Commission

"From: Maria denitto

"RE: Docket MM 99-325 (IBOC Digitalization)

"We are filing these Reply Comments in support of THE VIRGINIA CENTER FOR THE PUBLIC PRESS. Like them, and others, we are opposed to implementation of In Band On Channel (IBOC) Digitalization. We are concerned that IBOC could displace the frequency for which we have applied, and many other frequencies as well. IBOC could displace both aspiring stations, such as ours, and established stations as well.

"We urge the Commission to proceed with the Eureka-147 alternative Digitalization technology, which would avoid the displacement problem. Even then, of course, the Eureka-147 technology should first be tested and evaluated as thoroughly as the IBOC technology has been.

"In no event should IBOC Digitalization be adopted without full and complete testing and evaluation of the less disruptive Eureka-147 Digitalization technology."